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*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and for the Estate of Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ESTATE OF JAMES HELLER, BARBARA H.
FRIETAG, as personal representative and as an
individual, STEVEN P. HELLER, as personal
representative and as an individual, HARRY H.
FALK, as personal representative, EVE FRIETAG,
ELIZABETH FRIETAG DRANOFF, TRUST FBO
AN.D. [a minor] UNDER ARTICLES SIXTH AND
EIGHTH OF THE LAST WILL AND TESTAMENT
OF JAMES HELLER, a New York trust, BARBARA

Adv. Pro. No. 10-05061 (SMB)

H. FRIETAG, as trustee, TRUST FBO AL.D. [a minor] UNDER ARTICLES SIXTH AND EIGHTH OF THE LAST WILL AND TESTAMENT OF JAMES HELLER, a New York trust, BARBARA H. FRIETAG, as trustee, TRUST FBO S.H. [a minor] UNDER ARTICLES SIXTH AND EIGHTH OF THE LAST WILL AND TESTAMENT OF JAMES HELLER, a New York trust, STEVEN P. HELLER, as trustee, TRUST FBO KATHERINE HELLER UNDER ARTICLES SIXTH AND EIGHTH OF THE LAST WILL AND TESTAMENT OF JAMES HELLER, a New York trust, STEVEN P. HELLER, as trustee, KATHERINE HELLER, and ELEANOR LEACOCK,

Defendants.

CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures shall be due: July 15, 2014.
2. Fact Discovery shall be completed by: March 19, 2015.
3. The Deadline for Service of Substantive Interrogatories shall be: December 19, 2014.
4. The Disclosure of Case-in-Chief Experts shall be due: August 28, 2015.
5. The Disclosure of Rebuttal Experts shall be due: September 28, 2015.
6. The Deadline for Completion of Expert Discovery shall be: December 18, 2015.
7. The Deadline for Service of a Notice of Mediation Referral shall be: On or before February 19, 2016.
8. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before March 4, 2016, or within 14 days after the service of the Notice of Mediation Referral, whichever is earlier.

9. The Deadline for Conclusion of Mediation shall be: On or before July 1, 2016, or within 120 days of the date of service of the Notice of Mediator Selection, whichever is earlier.

Dated: New York, New York
May 12, 2014

Of Counsel:

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